
IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA

DAVID HAWKINS and KIM HAWKINS, and TYLER HAWKINS,
ASHLEY HAWKINS, and CHASE HAWKINS, Minors, by and
through their next friend, DAVID HAWKINS,

Appellants,

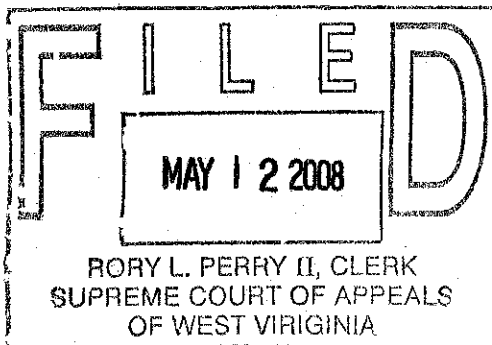
v.

THE WEST VIRGINIA DEPARTMENT OF PUBLIC SAFETY,
a/k/a THE WEST VIRGINIA STATE POLICE, THE COMMISSION
ON DRUNK DRIVING PREVENTION,

Appellee.

From Kanawha County Circuit Court
No. 06-C-1004

**RESPONSE OF THE WEST VIRGINIA DEPARTMENT OF
PUBLIC SAFETY, a/k/a THE WEST VIRGINIA STATE POLICE,
THE COMMISSION ON DRUNK DRIVING PREVENTION
TO APPELLANTS' BRIEF FILED APRIL 10, 2008**



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COME NOW, the Appellee, The West Virginia Department of Public Safety a/k/a The West Virginia State Police, the Commission on Drunk Driving Prevention and hereby offers this brief in response to the Appellants' Brief.

I. PROCEDURAL BACKGROUND

David Hawkins, Kim Hawkins, Tyler Hawkins, Ashley Hawkins and Chase Hawkins (hereinafter referred to as "the Appellants") filed a civil action alleging negligence on the part of the Appellee related to an injury sustained to David Hawkins while in the course of and arising out of his employment with the West Virginia State Police.

The Circuit Court of Kanawha County granted a Motion to Dismiss filed on behalf of the Appellee holding that a reasonable construction of the Workers' Compensation Act read in pari materia with the provisions of the Death, Disability and Retirement Fund of the West Virginia State Police provides statutory immunity to the West Virginia State Police for the injury claims of its uniformed members (such as David Hawkins) sustained in the course and scope of their employment with the West Virginia State Police.

The Division of Public Safety now refers to the West Virginia State Police, which falls under the purview of the West Virginia Department of Public Affairs and Public Safety. *See W. Va. Code* §15-2-2. Although not raised on appeal, the Appellee would note that the Circuit Court's Order of Dismissal references the fact that the Appellants have voluntarily dismissed the Department of Public Safety from this litigation.

In addition, the Appellants are not appealing that portion of the Circuit Court's Order which dismisses the Commission on Drunk Driving Prevention, which was created within the West Virginia State Police by *W. Va. Code* § 15-2-40. The Commission's powers and duties are finite in scope and do not include the ability to sue or to be sued. *See W. Va. Code* §15-2-41. Accordingly, despite the fact that the Appellants named three interrelated defendants, for the intent and purposes of this appeal, the only Appellee is the West Virginia State Police.

II. FACTUAL BACKGROUND

On September 20, 2005, Appellant David Hawkins, a Sergeant with the West Virginia State Police, was injured while in the course of his employment. At the time, Sergeant Hawkins was performing services on the BATmobile, a mobile office utilized for DUI checkpoints when he allegedly was caught on one of the BATmobile's latches, causing him to fall and sustain personal injury.

On July 18, 2006, David Hawkins filed a lawsuit against the West Virginia State Police, his former employer, and Mattman Security, Inc., the designer and manufacturer of the aforementioned BATmobile. Mr. Hawkins alleged in his Complaint that the employees of the West Virginia State Police negligently performed their duties by failing to repair and maintain the BATmobile. Mr. Hawkins also alleged that Defendant Mattman Security, Inc. negligently designed, manufactured and supplied the BATmobile with defective latches, one of which is alleged to have caused the injuries sustained by Mr. Hawkins. Mr. Hawkins' wife and children, Kim, Tyler, Ashley and Chase respectively, filed a claim for loss of consortium.

III. STANDARD OF REVIEW

Appellate review of a circuit court's order granting a motion to dismiss a complaint is *de novo*. Revene v. Charles County Comm'rs, 882 F.2d 870, 872 (4th Cir.1989). Complaints are to be read liberally as required by the notice pleading theory underlying the West Virginia Rules of Civil Procedure. Mandolidis v. Elkins Indus., Inc., 161 W.Va. 695, 246 S.E.2d 907 (1978); John W. Lodge Distrib. Co., Inc. v. Texaco, Inc., 161 W.Va. 603, 245 S.E.2d 157 (1978). See also Conley v. Gibson, 355 U.S. 41, 47-48, 78 S.Ct. 99, 102-03, 2 L.Ed.2d 80, 85-86 (1957). The circuit court, viewing all the facts in a light most favorable to the nonmoving party, may grant the motion if "it appears beyond doubt that the plaintiff can prove no set of facts in support of his[, her, or its] claim which would entitle him[, her, or it] to relief." Syl. pt. 3, in part, Chapman v. Kane Transfer Co., Inc., 160 W.Va. 530, 236 S.E.2d 207 (1977), citing Conley, 355 U.S. at 45-46, 78 S.Ct. at 102, 2 L.Ed.2d at 84.

Where the issue on an appeal from the circuit court is clearly a question of law or involving the interpretation of a statute, we apply a *de novo* standard of review." Syllabus point 1, Chrystal R.M. v. Charlie A.L., 194 W.Va. 138, 459 S.E.2d 415 (1995). Syllabus point 1, University of West Virginia Board of Trustees ex rel. West Virginia University v. Fox, 197 W.Va.

91, 475 S.E.2d 91 (1996).” Syl. pt. 3, Ewing v. Board of Educ. of County of Summers, 202 W.Va. 228, 503 S.E.2d 541.

On appeal of this case, the parties do not dispute the facts. To the contrary, they argue the sole issue is one of law and statutory construction. As a result of this inquiry being a matter of statutory construction, the Court’s power of interpretive scrutiny is plenary. See Mildred L.M. v. John O.F., 192 W.Va. 345, 350, 452 S.E.2d 436, 441 (1994).

IV. ARGUMENT

The Appellants contend that the Circuit Court of Kanawha County erred in dismissing their claims against the West Virginia State Police. In support of said argument, they aver that a reading of W. Va. Code §23-2-6 and §23-2-9 should lead this Court to conclude that the West Virginia State Police are not entitled to the immunities provided by the Workers’ Compensation Act. However, the Appellee would argue that a reading of the Workers’ Compensation Act in pari materia with the West Virginia Department of Public Safety Reorganization Act (W. Va. Code §15-2-1 et. seq.) provides ample support for the Circuit Court’s dismissal of the Appellants’ claims against the West Virginia State Police.

W. Va. Code §23-2-1(a) provides that “the state of West Virginia and all government agencies or departments created by it...are employers within the meaning of this chapter and are hereby required to subscribe to and pay premium taxes into the workers’ compensation fund for the protection of their employees and shall be subject to all requirements of this chapter...” As noted by this honorable Court in Beckley v. Kirk, 193 W. Va. 258, 455 S.E. 2d 817 (1995), “[o]n its face this statute appears to include the Division of Public Safety (which has since been renamed the West Virginia State Police); however, proper treatment of this issue requires a brief historical review and comparison of the Workers’ Compensation Fund and the Death, Disability and Retirement Fund.”

A. BACKGROUND ON THE CREATION OF THE WORKERS' COMPENSATION FUND AND THE DEATH, DISABILITY AND RETIREMENT FUND

A historical review of these two funds and a reasonable construction thereof provides substantial credence for the Circuit Court's determination that the West Virginia State Police should be entitled to statutory immunity from the Appellants' negligence claims.

The West Virginia Workmen's Compensation Fund,¹ adopted in 1913, was amended in 1919 to allow all governmental agencies to participate. 1919 *Acts of the Legislature, Regular Session*, c. 131, § 9. The Department of Public Safety (now the West Virginia State Police), however, was either excluded by legislative intent or declined to participate. In 1922 the Superintendent of State Police, in his report to the Governor, complained that there was no pension provision or any other fund to provide troopers disabled in the line of duty a living allowance. Jackson Arnold, *Report to the Governor*, 8 (30 June 1922).

In 1923, apparently in response to the 1922 report, the Legislature authorized the Superintendent to compensate injured troopers from the DPS operating budget. 1923 *Acts of the Legislature, Regular Session*, c. 147, § 58. The 1924 report of the Superintendent complained that the funds budgeted by the 1923 Legislature would soon expire, again leaving disabled members without benefits. Jackson Arnold, *Biennial Report of the West Virginia State Police*, 12 (1924). In 1925, the Legislature created the Death and Disability Fund. 1925 *Acts of the Legislature, Regular Session*, c. 4, §§ 1, 2, 3. The purpose of the Death and Disability Fund was, and is, to provide compensation to injured state troopers.

Despite the creation of the Death and Disability Fund (later referred to as the Death, Disability, and Retirement Fund), the Superintendent once again requested that legislation be enacted to place members under the gambit of protection afforded by the Workers'

¹ Now referred to in the gender neutral title as the Workers' Compensation Fund.

Compensation Fund, despite the fact that the state troopers would have been much less generously compensated under Workers' Compensation than under the Death and Disability Fund. See R.E. O'Connor, *Fifth Biennial Report of the Department of Public Safety*, 16 (1928). Subscription to the WC Fund became mandatory for state agencies in 1937, yet no effort was made to compel subscription by the DPS. 1937 *Acts of the Legislature, Regular Session*, c. 104, § 1. Moreover, the Legislature has never appropriated funds for the DPS to pay Workers' Compensation premiums.

As noted by Justice Neely in the aforementioned Beckley case, "[w]hen viewing the history of the Death, Disability and Retirement Fund in conjunction with the history of the Workers' Compensation Fund, it becomes clear that the Legislature intended the DDR Fund to be *a comprehensive system of compensation* and never intended for state troopers to be covered under the Workers' Compensation Fund." Beckley at p. 261.

W. Va. Code §15-2-26(a) provides that "[t]here shall be continued the death, disability and retirement fund heretofore created for the benefit of members of the division of public safety and any dependent of a retired or deceased member thereof." The awards and benefits awarded therein are discussed in detail in W. Va. Code § 15-2-29 through §15-2-36. Again, it is critical to note that this Court has already expressed the fact that "[b]enefits under the DDR Fund are superior to the WC Fund." Id. at p. 261. Among the key differences between the two, the DDR Fund provides state troopers with their full salary. The Workers' Compensation Fund does not. The DDR Fund covers non-work related injuries. The Workers' Compensation Fund does not. Under the DDR Fund, state troopers continue to accrue annual and sick leave and are not charged for sick leave while absent from duty. There are no such provisions under the Workers' Compensation Fund.

Based primarily on the superiority of the DDR Fund in relation to the Workers'

Compensation Fund, this Court in *Beckley* held that "it should hardly come as a surprise that allowing troopers coverage under both systems would frequently result in a trooper's receiving benefits in an amount that *exceeds* his or her salary." Because of the absurdity such a result would have bred, this Court determined that state troopers were not eligible for coverage under the workers' compensation system.

In reaching that decision, this Court relied upon Syl. Pt. 2 of *Newhart v. Pennybacker*, 120 W. Va. 774, 200 S.E. 350 (1938), which states that "[w]here a particular construction of a statute would result in an absurdity, some other **reasonable construction**, which will not produce such absurdity, will be made." (Emphasis added).

In similar fashion, the Appellee would aver that the Circuit Court's Order, which reasonably construed the Workers' Compensation Act in pari materia with the West Virginia Department of Public Safety Reorganization Act to determine that the West Virginia State Police should properly be entitled to immunity from lawsuits brought by its employees who have been injured on the job and who have **already** received compensation under the DDR Fund. A fund which is far superior to that of the Workers' Compensation Act.

B. THE APPELLANTS' NARROW CONSTRUCTION OF CERTAIN PROVISIONS OF THE ACT CONTRAVENES THE CIRCUIT COURT'S ORDER, WHICH RIGHTFULLY FINDS THAT THE CLEAR INTENTION OF THE ACT IS INTENDED TO PROVIDE BENEFITS TO EMPLOYEES AND IMMUNITY FROM LITIGATION FOR EMPLOYERS.

In lieu of just examining the two statutes referenced in the petition for appeal, it is important to examine the purpose and intent of the entire Workers' Compensation Act. As noted in *Meadows v. Lewis*, 172 W. Va. 457, 469, 307 S.E. 2d 625, 638 (1983), "[t]he West Virginia Workers' Compensation system exists to the benefit of both employers and employees, freeing employers from lawsuits for simple negligence while ensuring employees compensation for

their work-related injuries. The Act is designed to compensate injured workers as speedily and expeditiously as possible in order that injured workers and those who depend upon them for support shall not be left destitute during a period of disability. The benefits of this system accrue both to the employer, *who is relieved from common-law tort liability for negligently inflicted injuries*, and to the employee, who is assured prompt payment of benefits.” (Emphasis added).

C. THE CIRCUIT COURT CORRECTLY RULED THAT THE APPELLEE SHOULD BE ENTITLED TO THE IMMUNITIES PROVIDED UNDER THE WORKERS’ COMPENSATION ACT BY VIRTUE OF ITS PROVIDING BENEFITS TO ITS INJURED EMPLOYEES THROUGH THE LEGISLATIVELY APPROVED DEATH, DISABILITY & RETIREMENT FUND.

Under W. Va. Code § 23-2-6, any employer subject to this chapter who subscribes and pays into the workers’ compensation fund the premiums provided by this chapter or who elects to make direct payments of compensation as provided in this section is not liable to respond in damages at common law or by statute for the injury or death of any employee. An employer who is otherwise entitled to the immunity provided by W. Va. Code § 23-2-6 (1991) may lose that immunity in only one of three ways: (1) by defaulting in payments required by the Workers’ Compensation Act or otherwise failing to be in compliance with the Act; (2) by acting with “deliberate intention” to cause an employee’s injury as set forth in W. Va. Code § 23-4-2(d); or (3) in such other circumstances where the Legislature has by statute expressly provided an employee a private remedy outside the workers’ compensation system. Bias v. Eastern Associated Coal Corp., 640 S.E. 2D 540, 220 W.Va. 190 (2006).

The Appellants contend that from a purely technical standpoint, it is easy to conclude that because the West Virginia State Police do not subscribe to the Workers’ Compensation Fund, that they are not entitled to the immunities contained therein because they are “in default” and

cannot demonstrate compliance with the statutes. The Appellants argue that the statutes are clear and thus, not subject to construction.

In response, the West Virginia State Police would counter by noting that the West Virginia Workers' Compensation Act should not be viewed with such an overly technical eye. See *Fair v. Korhumel Steel & Aluminum Co., Inc.*, 473 F. 2d 703 (1973). In *Fair*, the Fourth Circuit Court of Appeals was asked to examine whether the employer (Korhumel) had complied with the requirements of the Act. While mindful of the spirit of the Act, the Court concluded that Korhumel's failure to contact the Workmen's Compensation Commission resulted in a failure to obtain coverage. As noted by the *Fair* Court, "[t]hese defaults are not technical. They go to the heart of the statute-the public policy of assuring that employees will be protected."

In stark contrast to employer Korhumel's failure to make any attempts to procure some sort of coverage, the West Virginia State Police has complied with the spirit and intent of the Workers' Compensation Act by opting to make direct payments to its injured employees through the Death, Disability and Retirement Fund, as opposed to subscribing to the Workers' Compensation Fund. A practice which is permitted under the language of W. Va. Code §23-2-6.

Secondly, the Appellee would argue that it is entitled to status as an employer under W. Va. Code §23-2-9(a)(1)(B) because of its capability to maintain a system of compensation which is at least equal in value to those provided by the WCF. In fact, as clearly noted in *Beckley*, the DDR fund is "far superior in any overall sense." *Beckley* at p. 262. Once again, the Appellants counter by offering a technical argument by which they contend that because the employees do contribute to the fund that the State Police should not be accorded status as a true "self-insured" and thus accorded the immunity of the statute. However, the phrase "self-insurance" means, generally, the assumption of one's own risk and, typically, involves the *setting aside of a special fund* to meet losses and pay valid claims, instead of insuring against such losses and claims

through an insurance policy. See Jackson v. Donahue, 457 S.E. 2d 524, 193 W. Va. 587 (1995). (Emphasis added).

In the instant matter, the West Virginia State Police, through statutory powers given to the Superintendent of the West Virginia State Police; and the Death, Disability and Retirement Fund, established through the same legislative channels which give rise to the Workers' Compensation Fund clearly provide a source of benefits and compensation which comports with the intent of the Workers' Compensation Act. The West Virginia State Police makes "direct payment" of compensation to its employees through the DDR Fund, thus entitling it to exemption from liability for negligence per W.Va. Code §23-2-6. In addition, the DDR Fund is the type of "benefit fund or system of compensation" referenced in W. Va. Code §23-2-9, which should entitle it to status as "self-insured."

D. THE CIRCUIT COURT'S ORDER DISMISSING THE CLAIMS OF THE APPELLANTS IS PROPER AS IT COMPLIES WITH THE LIBERAL AND NON-TECHNICAL INTENT OF THE WORKERS' COMPENSATION ACT.

First, the Circuit Court's Order is supported by the manner in which the Workers' Compensation Act is to be construed. As explained in the dissent of Justice Davis in the aforementioned Repass case, "the workers' compensation system of this State was created by the Legislature in 1913. At its inception, it was clearly intended that the workers' compensation scheme would be *liberally construed*, as is demonstrated by the following provision from the founding Act: *citing* 1913 Acts of the Legislature, Regular Session, c. 10.

[The] commission shall not be bound by the usual common law or statutory rules of evidence, or by any technical or formal rules of procedure, other than herein provided, but may make the investigation in such manner as in its judgment is best calculated to ascertain the substantial rights of the parties and *to carry out justly and liberally the spirit of this act*. 1913 Acts of the Legislature, Regular Session, c. 10, § 44 (emphasis added).

While said provisions would perhaps normally relate to issues that would ultimately favor an employee, it has long been established that the Act is designed to provide benefits for both the employers and the employees. Accordingly, the West Virginia State Police's actions in paying benefits to its employees through the DDR Fund should be found to comply with an Act that is designed to be carried out justly, liberally and viewed without a technical eye.

By referencing *technical* issues related to the payment of premiums and a failure to subscribe to the requirements of the fund, the Appellants request that this Court ignore the nature in which the Act is to be construed and to justify a finding that would entitle an employee to not only reap the dividends of a program which *far exceeds* the benefits provided by the Workers' Compensation Fund, but would then give the same employee the opportunity for additional recovery via a negligence lawsuit.

E. THE CIRCUIT COURT CORRECTLY HELD THAT THE APPELLEE IS ENTITLED TO THE IMMUNITIES PROVIDED UNDER THE WORKERS' COMPENSATION ACT BY VIRTUE OF ITS STATUS AS AN "EMPLOYER" WITH A RECOGNIZED SYSTEM OF COMPENSATION FOR ITS INJURED EMPLOYEES.

Secondly, the Appellants aver that the aforementioned Workers' Compensation statutes are clear, and thus, are not subject to construction. They further argue that a statute must be given its plain ordinary meaning. However, a question arises in this matter, as a plain reading of W. Va. Code § 23-2-1, the Workers' Compensation Act seems to clearly indicate that the "state of West Virginia and all governmental agencies...are employers within the meaning of this chapter." On its face, this statute would appear to include the West Virginia State Police. Nonetheless, there has been no effort undertaken by the legislature of this state to compel the State Police to subscribe to the Fund, nor has the legislature ever appropriated funds for the State Police to pay Workers' Compensation premiums. See Beckley at p.261.

As such, the Appellee would contend that more than a simple reading of the statutes is necessary to determine whether the Appellants' claims should stand. In lieu of a simple reading, the Appellee would argue that a statute should be "so read and applied as to make it accord with the *spirit, purposes and objects* of the general system of law of which it was intended to form a part; it being presumed that the legislators who drafted and passed it were *familiar with all existing law*, applicable to the subject matter, whether constitutional, statutory or common, and intended the statute to harmonize completely with the same and aid in the effectuation of the general purpose and design thereof, if its terms are consistent therewith." Syl. Pt. 4, Kessel v. Monongalia County General Hosp. Co., 648 S.E. 2d 466 (2007); citing Syl. Pt. 5, State v. Snyder, 64 W.Va. 659, 63 S.E. 385 (1908). (Emphasis added).

In this matter, the Appellee would rely upon and refer this honorable Court to the many cases, some of which have been cited herein (such as Repass), which clearly establish that the Act is designed to provide a system of benefits to injured employees while affording employers freedom from lawsuits brought for negligence claims. It is undisputed in this matter that the injured employee, David Hawkins, has been and will continue to receive benefits under the provisions of the Death, Disability & Retirement Fund. This fund (authorized by statute) provides a system of compensation which undoubtedly comports with the spirit of the Workers' Compensation Act.

In turn, it should necessarily follow that by virtue of the Appellee's good-faith compliance with the spirit of the Act, that it should be entitled to immunity from the Appellants' negligence lawsuit. To permit the Appellants' claims would be in violation of the Act, as it would deprive his employer from accruing any benefits intended by passage of the Act. Conversely, to uphold the Circuit Court's Order dismissing the negligence claims is consistent

with the Act, as it provides immunity to the employer while ensuring that the employee has been adequately compensated.

F. THE CIRCUIT COURT'S ORDER OFFERS A REASONABLE CONSTRUCTION OF THE WORKERS' COMPENSATION ACT AND VOIDS THE POSSIBILITY OF AN ABSURD RESULT WHICH WOULD FOLLOW WERE THE APPELLANTS ALLOWED TO MAINTAIN THEIR CLAIMS AGAINST THE APPELLEE WHILE STILL RECEIVING BENEFITS THROUGH THE DEATH, DISABILITY & RETIREMENT FUND.

Finally, the Appellee would argue that the Circuit Court's Order reasonably construes the Act in pari materia with the DDR Fund. Statutes which relate to the same subject matter should be read and applied together so that the Legislature's intention can be gathered from the whole of the enactments." Syl. Pt. 3, *Smith v. State Workmen's Compen. Commr.*, 159 W.Va. 108, 219 S.E.2d 361 (1975); see also Syl. Pt. 5, in part, *Fruehauf Corp. v. Huntington Moving & Storage Co.*, 159 W.Va. 14, 217 S.E.2d 907 (1975) ("Statutes which relate to the same persons or things, or to the same class of persons or things, or statutes which have a common purpose will be regarded in pari material to assure recognition and implementation of the legislative intent.").

As previously noted, the purpose of the DDR Fund was, and is, to provide compensation for injured state troopers. It is entirely reasonable for the Circuit Court to view the legislative statute which creates the fund in pari materia with the Workers' Compensation Act. In fact, not doing so would lead to an absurd result, as Appellant David Hawkins would be entitled to compensation for his injury, by virtue of a fund which is far superior to that provided by the Workers' Compensation Fund, and yet the entity responsible for contributing to the fund, the West Virginia State Police, would be afforded no protections, despite the fact that its fund goes above and beyond the requirements of the Workers' Compensation Act. As thoughtfully pointed out by this Court in *Newhart*, where such a construction would result in an absurdity, some other reasonable construction, which will not produce such absurdity will be made. The Order of the

Circuit Court of Kanawha County affords such a reasonable construction, and as such, the Order should be upheld.

V. CONCLUSION

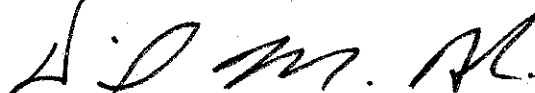
The Circuit Court of Kanawha County, West Virginia, ruled appropriately and lawfully and committed no reversible error in granting the motion to dismiss in favor of the respondent.

Wherefore, this Court should deny Appellants' Brief and let stand the rulings of the Kanawha County Circuit Court.

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VIRGINIA STATE POLICE, THE
COMMISSION ON DRUNK DRIVING
PREVENTION,**

Appellee,

Respectfully Submitted:



GARY E. PULLIN (4528)
WENDY E. GREVE (6599)
DAVID M. ADKINS (9498)

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IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA
CHARLESTON

DAVID HAWKINS and KIM
HAWKINS, and TYLER HAWKINS,
ASHLEY HAWKINS, and CHASE
HAWKINS, Minors, by and
through their next friend, DAVID HAWKINS,

Appellants,

v.

Case No. 072793

THE WEST VIRGINIA DEPARTMENT OF
PUBLIC SAFETY, a/k/a THE WEST VIRGINIA
STATE POLICE, THE COMMISSION ON
DRUNK DRIVING PREVENTION,

Appellees.

CERTIFICATE OF SERVICE

The undersigned counsel for Defendant, The West Virginia Department of Public Safety, a/k/a The West Virginia State Police, The Commission on Drunk Driving Prevention, does hereby certify that on this 12th day of May, 2008, a true copy of the foregoing *"Response of the West Virginia Department of Public Safety, a/k/a The West Virginia State Police, The Commission on Drunk Driving Prevention to Appellants' Brief Filed April 10, 2008"* has been served via United States mail, in properly addressed envelopes with postage fully paid, to the following counsel of record:

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A handwritten signature in dark ink, appearing to read "G.E. Pullin". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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